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January 14, 2015

Via ECF

The Honorable Magistrate Judge Laurel Beeler
United States District Court for the Northern District of California
San Francisco Courthouse, Courtroom C - 15th Floor
450 Golden Gate Ave.,
San Francisco, CA 94102

Re: Souza et al. v. Caltrans et al., No. 13-4407-JD

Dear Judge Beeler,

I represent Plaintiffs in the above referenced action. On behalf of Plaintiffs and Defendants, counsel for whom are copied here, we write to inform the Court concerning the status of the parties' discussions concerning how to proceed with regard the attorneys' fees issue.

Counsel for the parties have met and conferred concerning a framework for a potential negotiated resolution of Plaintiffs' request for fees and costs. Concerning certain issues, the parties need to confer further with their respective clients before submitting a proposal to the Court.

The parties thus jointly request that the deadline for making such a proposal be extended from Thursday, January 15, 2015, as set in the Court's Minute Order, Dkt. No. 125, to Tuesday, January 20, 2015.

Respectfully submitted

/s/ Stuart G. Gross

STUART G. GROSS

cc (via ECF): Daniel Pollak (Counsel for Federal Defendants)
Derek Van Hoften (Counsel for State Defendants)

